

Index No.

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

Date Purchased:

-----X  
GURSEWAK SINGHPlaintiff designate  
Queens County as  
the place of trial

Plaintiff(s),

-against-

The basis of venue  
situs of subject  
premisesHOLLY TUDOR;  
LINDEN TUDORSUMMONS

Defendant(s).

-----X  
To the above named Defendant(s):

YOU ARE HEREBY SUMMONED to Answer the Complaint in this action and to serve a copy of your Answer, or, if the Complaint is not served with this Summons, to serve a Notice of Appearance, on the plaintiff's attorney within 20 days after the service of this Summons, exclusive of the day of service ( or within 30 days after the service is complete if this Summons is not personally delivered to you within the State of New York); and in case of your failure to appear or answer, judgment will be taken against you by default for the relief demanded in the Complaint.

Dated: Kew Gardens, New York  
December 3, 2019

Defendant's Address:

Yours, etc.

  
JONATHAN SILVER, ESQ.

Attorney for Plaintiff

80-02 Kew Gardens Road  
Kew Gardens, New York 11415  
(718) 520-1010

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

-----X  
GURSEWAK SINGH

Plaintiffs,

COMPLAINT

-against-

HOLLY TUDOR;  
LINDEN TUDOR

Defendants.  
-----X

Plaintiff, complaining of the defendants, allege as follows:

1. Plaintiff is a resident of the County of Queens, State of New York.
2. Upon information and belief, defendants were owners of premises located at 109-70 133<sup>rd</sup> Street S Ozone Park New York.
3. Upon information and belief, defendants executed a deed dated March 26, 2003 transferring ownership of those premises to defendant HOLLY TUDOR.
4. Upon information and belief, said transfer was without consideration nor was it made for fair consideration.
5. Upon information and belief, defendants are related to each other

as husband and wife.

6. Upon information and belief, the defendants reside in the subject premises.

7. The defendant LINDEN TUDOR is a named defendant in a pending lawsuit filed by the plaintiff captioned Gursewak Singh v Lintech Electric, Inc. et al EDNY Case No.: 1:18-cv-05780 seeking on his behalf an award of monetary damages against the defendant LINDEN TUDOR for unpaid wages, unpaid overtime, unpaid prevailing wages, liquidated damages, interest and attorneys fees and other claims all due him pursuant to applicable law and regulation.

8. Upon information and belief, said conveyance as was made was fraudulent as to the plaintiff.

9. Upon information and belief, said conveyance was made with the intent on the part of the defendant LINDEN TUDOR to dispose of his assets, to hide his assets, to hinder and prevent persons such as the plaintiff from collecting and enforcing any judgment entered in his favor against said defendant, has resulted in that defendant having no or insufficient assets to make payment on his obligations to persons including the plaintiff and said conveyance was otherwise

fraudulent.

10. Upon information and belief, that transfer was made by the defendants with the specific and actual intent to hinder, delay and/or defraud persons such as plaintiff as creditors or future creditors as defined under New York Debtor and Creditor Law Section 276.

11. The defendants conspired with each other to accomplish the above.

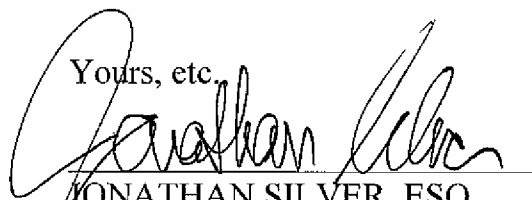
12. Upon information and belief, the plaintiff has no adequate remedy at law.

13. The plaintiff has been otherwise damaged as a result of the acts/omissions of the defendants, their agents, servants and assigns others working with his knowledge, consent and/or permission.

WHEREFORE, plaintiff demands judgment declaring the rights of the parties in and to the subject premises and otherwise; declaring the conveyance to be fraudulent; setting aside that conveyance; granting the plaintiff monetary damages as against the defendants; granting the plaintiff such other and further relief as is just and proper under the facts and circumstances of this claim together with reasonable attorneys fees, applicable interest, costs and disbursements.

Dated: Kew Gardens, New York  
December 3, 2019

Yours, etc.



JONATHAN SILVER, ESQ.  
Attorney for Plaintiff  
80-02 Kew Gardens Road  
Kew Gardens, NY 11415  
(718) 520-1010

**AFFIRMATION OF VERIFICATION**

JONATHAN SILVER hereby affirms under penalty of perjury, pursuant to C.P.L.R. 2106, that he is an attorney admitted to practice in the Courts of this State and he is counsel to Plaintiff in the within action; that the foregoing Complaint is true to his own knowledge, except as to matters therein stated to be alleged upon information and belief, and that as to those matters he believes them to be true. That this Complaint is affirmed by your affirmant and not by the Plaintiffs because the plaintiffs,

\_\_\_\_\_ is a foreign corporation,

\_\_\_\_\_ is a corporation, none of whose officers are within the county where affirmant has his office,

  x   is an individual not within the county where affirmant has his office,

and the source of affirmant's information, and the ground for his belief as to all the matters not stated upon his knowledge are the records and documents maintained as part of his file in the office of the undersigned and based upon conversations with Plaintiffs in connection with the facts and circumstances underlying this action and out of which said action arises.

Dated: Kew Gardens, New York  
December 9, 2019



JONATHAN SILVER